



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, WA 98101

June 25, 2007

Reply To  
Attn Of: ETPA-088

Ref: 04-057-AFS

Suzanne C. Rainville, Forest Supervisor  
Payette National Forest  
P.O. Box 1026  
McCall, ID 83638

Dear Ms. Rainville:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (FEIS) for the **Payette National Forest Travel Management Plan** (CEQ No. 20070194) in Idaho. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The FEIS describes the effects of five alternatives. The No Action Alternative would maintain the present system of roads, trails, and areas open to motorized vehicles in summer and winter. The Proposed Action (Alternative B) slightly decreases roads and motorized trails, but increases the miles of trail designed specifically for ATVs. Alternative B also decreases the area open to over-snow vehicle use in winter. Alternative C responds to requests for more motorized access in summer and winter by increasing the miles of motorized trails and areas open to over-snow vehicle use. Alternative D responds to concerns about the effects of motorized access on recreationists desiring a nonmotorized experience and on habitat connectivity for wolverine. Alternative D would reduce roads and motorized trails more than in Alternative B and close large areas to over-snow vehicle use. Alternative E is new to the Final EIS, and has been identified as the preferred alternative. This alternative was developed in response to internal and external comments received on the draft EIS. Alternative E would maintain groomed snowmobile opportunities as in Alternative C, and reduce the area of over-snow opportunities more than Alternatives B and C, but less than Alternative D. Alternative E would reduce roads and two wheel motorized trails, and provide greater ATV and OHV opportunities than Alternatives B and D, but less than Alternative C. All action alternatives would prohibit cross-country motorized travel on the approximately 500,000 acres currently open.

In our comments on the Draft EIS dated May 19, 2006, we indicated concern over impacts to public water supplies, water quality impaired streams and aquatic habitat. In Management Area 3 (MA 3) we noted that alternatives B and C would result in a significant increase in miles of designated ATV and OHV trails, and asked that the final analysis consider impacts these trails would have on drinking water supplies. The Final EIS responds to this

question on page 6-71 by saying that there are no surface public drinking water supplies located on the Payette NF within MA 3. We appreciate this follow up, but note that table SW-1 continues to indicate that there are two subwatersheds within MA 3 that serve public water systems. We recommend that this inconsistency be addressed in the Record of Decision. Further, we note that the new preferred alternative (Alternative E) increases the amount of designated ATV and OHV trails by 21.1 miles in MA 3. This goes beyond what was proposed in Alternative B by 13.7 miles. Alternative E also retains more miles of designated road within and outside of riparian conservation areas than does Alternative B. As a result, Alternative E, similar to Alternative C, shows the least improvement to soil and water resources (page 3-110). This development does not appear to be consistent with Forest Plan direction or the sediment TMDL for the Wieser River Subbasin. As noted on page 3-86, the 2003 Forest Plan directs the Forest to:

- Improve water quality and assist in de-listing 303(d) water bodies by reducing road-related accelerated sediment through a combination of road decommissioning, relocation, reconstruction, and maintenance in the Mann Creek, Pine Creek, West Fork Weiser River, East Branch Weiser River, East Fork Weiser River, Middle Fork Weiser River, and Little Weiser River drainages (p. III-131: Objective 0318).
- Restore riparian vegetation and floodplain function throughout the Management Area by reducing road-related impacts through relocation, reconstruction, or obliteration (p. III-131: Objective 0319).
- Reduce riparian road density and stream crossings in all drainages, with emphasis on those with bull trout populations or suitable habitat (p. III-131: Objective 0322).

Given documented road-related impacts to riparian areas (page 3-86), low geomorphic integrity in 37 of the 51 subwatersheds within the MA (page 3-82), and the listing of the above noted waterbodies under section 303(d) of the CWA, we encourage the Forest Service to revisit the decision to increase the amount of designated ATV and OHV trails, and the decision to retain road and trail miles that would have been eliminated under Alternative B. Consistent with the Forest Service and BLM Protocol for Addressing Clean Water Act Section 303(d) Listed Waters, the Travel Management Plan should proactively support TMDL development and implementation. In terms of achieving the TMDL load allocations established for the Wieser River, this means reducing sediment watershed wide (upland sources as well as those sources adjacent to riparian areas).

EPA's comments on the Draft EIS also indicated concern over MA 12 due to the large number of subwatersheds (15) containing CWA Section 303(d) listed streams and the number of roads and trails in areas with a high watershed vulnerability rating. The Final EIS largely responds to this concern by converting a number of trails in Alternative E to non-motorized use. This will reduce accelerated sediment impacts from motorized use consistent with Forest Plan Direction (p. III-252: Objective 1234). We do note, however, that the Forest Plan has a stated goal of rehabilitating, decommissioning or stabilizing Forest Trail 076 (Davis Ranch Road) to reduce accelerated erosion and sedimentation (p. III-252: Objective 1236). Alternative E would continue to designate this trail as 2-wheel motorized. Given the direction in the Forest Plan, along with the fact that the trail is currently closed due to safety concerns (F-19), EPA encourages the Forest Service to revisit this designation in the Record of Decision.

In sum, we recognize that by eliminating cross-country motorized travel on the approximately 500,000 acres currently open, all of the action alternatives would result in some measure of improvement in water quality and aquatic habitat. We commend the Forest Service for taking this approach, but we have remaining concerns about the potential impacts of the preferred alternative to water quality. Therefore we recommend that as the Record of Decision is developed, the Forest Service give additional consideration to whether the commitment of resources in Alternative E is fully consistent with existing planning direction in the 2003 Forest Plan, and interagency agreements such as the Forest Service and Bureau of Land Management Protocol for Addressing Clean Water Act Section 303(d) Listed Waters.

Thank you for the opportunity to provide comments on the Payette National Forest Travel Management Plan FEIS. If you have questions or would like to discuss these comments, please contact Teresa Kubo at (503) 326-2859.

Sincerely,

//s//

Christine B. Reichgott, Manager  
NEPA Review Unit